



UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

September 2009 Grand Jury

SACR 10-0028

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
JANE DOE,)
a/k/a "Michelle L.)
Anunciacion,")
Defendant.)

)

Case No. SA CR 10-

I N D I C T M E N T

[18 U.S.C. § 1424: False Personation In Naturalization Proceeding; 18 U.S.C. § 1425: Procurement Of Naturalization Unlawfully; 18 U.S.C. § 1524: False Statement In Passport Application; 42 U.S.C. § 408(a)(6): Furnishing False Information To Social Security Administration]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1424]

On or about February 23, 2000, in Orange County and elsewhere within the Central District of California, defendant JANE DOE, also known as "Michelle L. Anunciacion," an applicant in a naturalization and citizenship proceeding, knowingly

1 personated another and appeared falsely in an assumed and
2 fictitious name, specifically, the name of "Michelle Augustin
3 Llacuna," in connection with a naturalization ceremony and other
4 proceedings on defendant's application to become a naturalized
5 United States citizen.

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1 COUNT TWO

2 [18 U.S.C. § 1425]

3 On or about February 23, 2000, in Orange County, and
4 elsewhere within the Central District of California, defendant
5 JANE DOE, also known as "Michelle L. Anunciacion," knowingly
6 procured for herself, contrary to law, naturalization as a United
7 States citizen and documentary and other evidence of such
8 naturalization, to which she was not entitled.

9 Specifically, defendant knowingly procured naturalization
10 for herself, contrary to law, by making material false statements
11 in connection with her application for naturalization, including
12 statements (a) that her name was "Michelle Augustin Llacuna";
13 (b) that certain information accurately specified the names of
14 her parents, her date of birth, and her place of birth; and
15 (c) that defendant had never given false testimony for the
16 purpose of obtaining an immigration benefit. In truth, as
17 defendant then well knew, (a) "Michelle Augustin Llacuna" was not
18 her true name; (b) the information regarding the names of
19 defendant's parents, defendant's date of birth, and defendant's
20 place of birth were all untrue; and (c) defendant had given false
21 testimony to obtain an immigration benefit to which she was not
22 entitled, including false sworn statements regarding her name and
23 other identifying information in support of her application for
24 an immigrant visa and alien registration (by which she
25 fraudulently obtained admission into the United States and
26 issuance of a permanent resident alien card), and her application
27 for naturalization and related proceedings. Defendant also
28 procured her naturalization as a United States citizen contrary

1 to law, and to which she was not entitled, because she had
2 obtained her permanent residency status by fraud.
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1 COUNT THREE

2 [18 U.S.C. § 1542]

3 On or about January 5, 2001, in Orange County, within the
4 Central District of California, defendant JANE DOE, also known as
5 "Michelle L. Anunciacion," willfully and knowingly made a false
6 statement in an application for a United States passport, with
7 intent to induce and secure for her own use the issuance of a
8 passport under the authority of the United States, contrary to
9 the laws regulating the issuance of such passports and the rules
10 prescribed pursuant to such laws, in that, in such application,
11 defendant stated that her name was "Michelle Augustin Llacuna"
12 and provided other information regarding the names of her
13 parents, her date of birth, and her place of birth, whereas, in
14 truth and fact, as defendant then knew, her name was not
15 "Michelle Augustin Llacuna" and her other identifying information
16 was also false.

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1 COUNT FOUR

2 [42 U.S.C. § 408(a)(6)]

3 On or about July 20, 2007, in Orange County, within the
4 Central District of California, defendant JANE DOE, also known as
5 "Michelle L. Anunciacion," with intent to deceive the
6 Commissioner of Social Security as to her true identity,
7 knowingly and willfully furnished and caused to be furnished
8 false information to the Commissioner of Social Security with
9 respect to information required by the Commissioner of Social
10 Security in connection with the establishment and maintenance of
11 the records provided for in Title 42, United States Code, Section
12 405(c)(2), in that, in an application for a replacement Social
13 Security Card, defendant knowingly and willfully made false
14 statements as to her name, the names of her parents, her date of
15 birth, and her place of birth.

16
17 A TRUE BILL

18 _____
19 Foreperson

20 GEORGE S. CARDONA
21 Acting United States Attorney

22 CHRISTINE C. EWELL
23 Assistant United States Attorney
24 Chief, Criminal Division

25 
26 JEANNIE M. JOSEPH
27 Assistant United States Attorney
28 Acting Chief, Santa Ana Branch Office

29 ROBERT J. KEENAN
30 Assistant United States Attorney